

**Ketel One
VODKA**

June 21, 2005

Comment 108

Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
Attn: Notice No. 41,
P. O. Box 14412
Washington, DC 20044-4412

Dear Division Chief:

We are writing our comments in connection with the Division's above Notice request in regards to the additional disclosure of "Alcohol Facts". Our comments are in the same sequence as the general questions in the aforementioned Notice:

1. We believe that alcohol beverage containers should **not** bear an Alcohol Facts label similar to the one presented in the CSPI petition. If additional information is required, the Serving Facts panel should be made mandatory.
2. See comment # 1 above.
3. See comment # 1 above.
4. See comment # 1 above.
5. See comment # 1 above.
6. See comment # 1 above.
7. See comment # 1 above. We believe that consumers will benefit from the disclosure of the Serving Facts panel.
8. No comment.
9. All advertisements, including media, radio and print, should be consistent with the information included in alcohol beverage labels.

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We appreciate the opportunity to submit these comments and look forward to working with the Agency to improve the quality of alcohol beverage labeling requirements.

Sincerely,

William L. Eldien
President

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